

EXHIBIT K

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Emily Coulter,)	Case No.: 5:18-CV-01538-JLS
)	
Plaintiff,)	
)	
vs.)	
)	
Experian Information Solutions, Inc.; Chase)	
Bank USA, N.A.; TransUnion LLC,)	
)	
Defendants.)	

**PLAINTIFF'S ANSWERS TO DEFENDANT, CHASE BANK USA, N.A.'s
INTERROGATORIES**

Plaintiff, Emily Coulter, by and through undersigned counsel, hereby serves its Answers
to Defendant Chase Bank USA, N.A.'s Interrogatories.

Respectfully Submitted,

BY: /s/ Nicholas Linker
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Attorneys for Plaintiff

RESPONSE: Objection. Plaintiff objects to this interrogatory because it is not reasonably calculated to lead to discoverable information. Notwithstanding the objection, Mr. Ramsey Cory Coulter is the Plaintiff's husband.

INTERROGATORY NO. 16:

Identify your credit score as of (a) April 2015; (b) April 2016; (c) April 2017; (d) April 2018; and (e) August 2018 and the provider of each score.

RESPONSE: Objection. Plaintiff objects to this Request on the grounds that it is not proportionate to the needs of this case, overly broad, unduly burdensome, and not properly limited in time and scope.

INTERROGATORY NO. 17:

Please describe what you believe the "date of status" field represents.

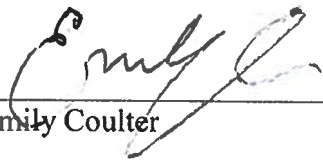
RESPONSE: The Date of Status field represents the day a debt is deemed uncollectible and thus charged off. *Toliver v. Experian Info. Solutions, Inc.*, 973 F. Supp. 2d 707, 725 (S.D. Tex. 2013). The Date of Status corresponds to a separate Status segment of the trade line. The Status segment reveals various forms of information concerning the trade line. The Date of Status should remain uniform throughout each credit report disclosing the trade line if there are no payments made as this date does not change regardless of whether the original creditor sells the debt to a third party.

INTERROGATORY NO. 18:

Please describe how you believe the "date of status" field impacts your credit score and what your reason for that belief is.

VERIFICATION

I hereby certify that the foregoing responses to Interrogatories are true and accurate to the best of my knowledge on the day these responses are given.


Emily Coulter